UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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	:	03 Civ. 8845 (TPG)
NML CAPITAL, LTD.,	:	05 Civ. 2434 (TPG)
	:	06 Civ. 6466 (TPG)
Plaintiff,	:	07 Civ. 1910 (TPG)
	:	07 Civ. 2690 (TPG)
v.	:	07 Civ. 6563 (TPG)
	:	08 Civ. 2541 (TPG)
THE REPUBLIC OF ARGENTINA,	:	08 Civ. 3302 (TPG)
	:	08 Civ. 6978 (TPG)
Defendant.	:	09 Civ. 1707 (TPG)
	:	09 Civ. 1708 (TPG)
	- x	

DECLARATION OF JAY NEWMAN

Pursuant to 28 U.S.C. Section 1746, Jay Newman declares as follows:

- 1. I am a Vice President of NML Capital Ltd.
- 2. I submit this declaration in support of NML's motion to compel Citibank N.A. to comply with a subpoena served on it on August 15, 2014 to set forth certain facts relevant to that motion.
- 3. On or about July 31, 2014, I met at our offices with a group of bankers including, among others, Juan Bruchou, the CEO of the LATAM/South Cluster of Citibank N.A. and the head of the Citibank branch in Argentina.
- 4. I spoke privately with Mr. Bruchou after that meeting, and during that conversation Mr. Bruchou told me that he would be willing to meet again in New York at any time if doing would be helpful in the resolving the legal cases at hand. Based on that conversation, what I know of Mr. Bruchou by reputation and his senior role at Citibank, it is my understanding that he travels extensively and visits New York City regularly on Citibank business.

Dated: September 8, 2014 New York, New York

Jay Newman